

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION OF SYNCORA GUARANTEE, INC.
REGARDING ITS REQUEST TO BE HEARD AT THE
FEBRUARY 1-2, 2023, OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. Syncora Guarantee, Inc. (“Syncora”) submits this informative motion in response to the Court’s *Order Regarding Procedures for February 1-2, 2023, Omnibus Hearing* (the “Procedures Order”) (ECF No. 23253)² and respectfully states as follows:

¹ The Debtors in these Title III cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Procedures Order.

2. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear in-person in the San Juan Courtroom and reserves the right to be heard on behalf of Syncora at the February 1-2, 2023, Omnibus Hearing.

3. Mr. Kirpalani intends to be heard on any matter raised by or presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Syncora.

4. Mr. Kirpalani intends to present oral argument on behalf of Syncora at the February 1, 2023 Oral Arguments related to the Summary Judgment Motions and related briefing in Fin. Oversight & Mgmt. Bd. for Puerto Rico v. U.S. Bank NA, as Trustee, Adv. Pro. No. 19- 391-LTS.³

5. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

³ See *Order Regarding Oral Argument on Motions for Summary Judgment* (ECF No. 119 in Case No. 19-00391-LTS). Time allocations and order of speakers for oral argument on the Motions will be outlined in the Agenda to be submitted by Debtors' counsel in accordance with Paragraph 7 of the Procedures Order.

DATED: January 25, 2023

Respectfully submitted,

REICHARD & ESCALERA

By : /s/ Rafael Escalera

Rafael Escalera

USDC No. 122609

escalera@reichardescalera.com

Sylvia M. Arizmendi

USDC-PR 210714

arizmendis@reichardescalera.com

Carlos R. Rivera-Ortiz

USDC-PR 303409

riverac@reichardescalera.com

255 Ponce de León Avenue

MCS Plaza, 10th Floor

San Juan, Puerto Rico 00917-1913

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Susheel Kirpalani (*pro hac vice*)
susheelkirpalani@quinnemanuel.com

Daniel Salinas

USDC-PR 224006

danielsalinas@quinnemanuel.com

Eric Kay (*pro hac vice*)

erickay@quinnemanuel.com

51 Madison Avenue, 22nd Floor
New York, New York 10010-1603

Co-Counsel for Syncora Guarantee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Carlos R. Rivera-Ortiz
USDC-PR 303409

EXHIBIT A

PARTY APPEARANCE SHEET

Name of Party	Syncora Guarantee, Inc.	
Attorney 1	Appearance Method	In Person San Juan
	Name	Susheel Kirpalani
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Email	susheelkirpalani@quinnmanuel.com
	Phone Number	212-849-7200
	Docket Entry No. of Notice of Appearance	ECF No. 22609